



Section	Major Provisions	Notes	Resources
Part 483.73	(1). Based on and	New requirement:	Tool for risk analysis
Emergency Plan:	include facility and	Facility specific risk	http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourc
Comply with all	community based	assessment,	<u>esGuides.aspx</u>
Fed, state, and	risk assessment	incorporating the	https://asprtracie.hhs.gov/technical-resources/3/Hazard-Vulnerability-
local emergency	utilizing an all-	community based risk	Risk-Assessment/0
preparedness	hazards approach	assessment	
requirements.	including missing		Contact Local authorities for info on community risks
Establish and	residents	Not limited to types	Hospital Preparedness Program Coordinator
maintain an EP		of hazards in local	Office of Emergency Services
program that		area	Fire or Emergency Medical Services
meets the		Also care -related,	Local Public health
requirements of		equipment/power	
this section.		failures, cyber and	An all-hazards approach is an integrated approach to emergency
Include but not		communication	preparedness planning that focuses on capacities and capabilities that are
be limited to		attacks	critical to preparedness for a full spectrum of emergencies or disasters.
following			
elements:			This approach is specific to the location of the provider or supplier and
			considers the particular types of hazards most likely to occur in their
			areas.
			Comprehensive planning guide tool
			http://cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGui
			des/DisasterPlanningGuide.aspx
(a) Reviewed and	(2). Strategies to	Emergency	In-depth procedures for identified risks
updated annually	address events	operations plan has	Tools for specific hazards

and do the following:	identified in risk assessment	to be tied to specific risks	http://www.cahfdisasterprep.com/PreparednessTopics.aspx https://asprtracie.hhs.gov/technical-resources/52/Long-term-Care-Facilities/52
			https://asprtracie.hhs.gov/technical-resources/36/Natural-Disasters/0
	(3). Address facility population including personsat-risk, types of service provided in an emergency, continuity of operations, delegation of authority, succession plans	New requirement: Resident – specific and service specific risks. Continuity of operations with succession planning	Resident –specific risk assessment will be done on your typical population and must address the unique needs they would have in an emergency Business Continuity Plan template http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx
	(4.) Include process for ensuring cooperation and collaboration with local, tribal, regional, state or fed emergency prep officials to maintain an integrated response during disaster or emergency, including documentation of the LTC facility's efforts to contact such officials and	New requirement: Local state prep officials – process for ensuring cooperation/collabor ation Integrated response communication channels/contacts for during event participation in planning	Develop a method to document the contact and participation with local officials. Could be a letter, a signature on your plan, and agenda and attendance sheet from meetings attended with them Local Healthcare Coalitions are convened in most counties for the purposes of integrated planning. Ask your local or state emergency officials or possibly the health and safety officer of the local hospital how to find out more about the local coalition https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Downloads/By-Name-by-State-Healthcare-Coalitions.pdf Need to add a 24/7 contact for emergencies in addition to 911. Also consider alternate method of contact if phones are out https://asprtracie.hhs.gov/technical-resources/78/Communication-Systems/0

(b) Policies and Procedures Based on risk assessment and communication plan	when applicable of its participation in collaborative/coope rative planning (1.) Provision of subsistence needs for staff and residents, whether evac or shelter in place including but not limited to the following	Staff is new requirement Taking subsistence along during evac also new	No amount of supplies specified by CMS but will be determined by the facility and based on their risk assessment. Suggest involve dietary consultant to address amounts, types of supplies, storage for Shelter in Place and evacuation at least until residents are in the receiving health care facility. http://cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/EmergencyFoodWater.aspx
P&Ps must be reviewed and updated at least annually and address the following:	i. Food, water, medical and pharmaceutical supplies	Pharmaceuticals new	Medications - Suggest this be researched with medical director, pharmacies and insurance plans which medications are critical to have, and how to stockpile and/or resupply meds If stockpiled need to develop system for how to store, and control access.
	ii. Alternate sources of energy to maintain: A] Temps to protect resident health and safety and safe storage of provisions B] Emergency lighting C] Fire detection, extinguishing, and alarms systems	New requirement for sewage and waste systems, along with the need to maintain temps for residents and storage of provisions Some facilities may have to replace generators if their risk assessment indicates that a generator is	CMS clarifies – "Alternate sources of energy depend on the resources available to a facility, such as battery-operated lights, propane lights, or heating, in order to meet the needs of a facility during an emergency. We would encourage facilities to confer with local health department and emergency management officials, as well as and healthcare coalitions, to determine the types and duration of energy sources that could be available to assist them in providing care to their patient population during an emergency. As part of the risk assessment planning, facilities should determine the feasibility of relying on these sources and plan accordingly"
	D] Sewage and waste systems	required to meet this need and the addition	"the provision and restoration of sewage and waste disposal systems could be beyond the operational control of some providers.

		of these mechanical systems is too large of a load to add to the transfer switch or generator.	However, we are not requiring LTC facilities to have onsite treatment of sewage or to be responsible for public services. LTC facilities would only be required to make provisions for maintaining the necessary services".
	(2.) A system to track the location of on-duty staff and sheltered residents in the LTC facility's care and after emergency.	Now includes on-duty staff	Tracking logs for residents Emergency Operations Plan Template (EOP) http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx These could be adapted for tracking on-duty staff
	If on-duty staff and sheltered residents are relocated during emergency, must document the specific names and location or the receiving facility or other location		
(b) Policies and Procedures continued	(3.) Safe evacuation includes: care and treatment of evacuees; staff responsibilities; transportation;	Expanded requirements specify beyond just the movement of residents (transportation and	EOP template has full section on evacuation http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx Nursing Home Incident Command is a good foundational tool for all complex response procedures
	ID evac location(s); primary and alternate means of communication with external	relocation site) but also a plan for their care along the way and in relocation site. Communication with external sources of	http://www.cahfdisasterprep.com/NHICS.aspx other tools http://cahfdisasterprep.com/PreparednessTopics/ResponsePlanning.aspx

sources of a	assistance involves	https://asprtracie.hhs.gov/technical-resources/57/Healthcare-Facility-
assistance	devices and access to	Evacuation-Sheltering/57
t	the contact info.	
(4.) Means to	Expanded	Shelter in Place Planning Guide
shelter in place for r	requirement. Staff	https://www.ahcancal.org/facility_operations/disaster_planning/Docume
residents, staff,	and volunteers	nts/SIP_Guidebook_Final.pdf
volunteers who		
remain in the LTC		
Facility		
(5.) System of	Expanded	Develop this procedure with facility's privacy office to ensure that HIPPA
medical r	requirement.	is maintained.
documentation that F	Preservation and	
	access of medical	CMS has stated this is flexible because of wide range of record keeping
resident's c	documentation not	systems.
•	addressed before at	This needs to reflect the risk assessment for each facility.
	state or fed level.	
	EHR – access may be	If flood or fire are major risks for examples, a plan to relocate all medical
	issue	records would be expected.
	Non EHR-	
	preservation may be	
	issue	
availability of		
records		
' '	New requirement	Emergency Staffing strategies
	Will need to utilize	EOP template has full section on staffing
,	MRCs	http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourc
0 7 0	ESAR-VP	esGuides/PlanningTemplatesChecklists.aspx
	Surge strategies for	
· ·	staffing	https://asprtracie.hhs.gov/documents/tips-for-retaining-and-caring-for-
for integration of		<u>staff-after-disaster.pdf</u>
state or federally		
designated health		Surge capacity tools
care professionals		http://www.cahfdisasterprep.com/PreparednessTopics/SurgeCapacity.as
		<u>px</u>

	to address surge needs in emergency		http://www.bepreparedcalifornia.ca.gov/cdphprograms/publichealthprograms/emergencypreparednessoffice/epoprogramsandservices/surge/surgestandardsandguidelines/documents/cdph_ltc_operational_tools_public_comment_020810.pdf The availability and process for requesting health care emergency volunteers needs to be explore at the local level. The facility will need to develop policies and procedures for screening and utilizing emergent volunteers. Forms and sample policy in the EOP template http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx
(b.) P&P cont	(7). Develop arrangements with other LTC facilities and other providers to receive residents in the event of limitations or cessation of operations to maintain the continuity of services to LTC residents	Expanded requirement Has been addressed in state regs but not extensively and not previously addressed by CMS	EOP template http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourc esGuides/PlanningTemplatesChecklists.aspx Sample Memorandums of Understanding http://cahfdisasterprep.com/PreparednessTopics/ResponsePlanning/GuidetoMOUs.aspx
	8. Role of LTC facility under 1135 waiver in the provision of care and treatment at an alternate care site identified by emergency	New requirement Policies and procedures developed for above (b)(7) would probably be the foundation ACS are not licensed health facilities so	CMS FAQ Section K CMS Guidance: Medicare FFS http://cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/Regulatory.aspx Need to refer to specific state regulations and local authorities regarding the use of alternate care sites.

	management officials	planning for equipment and supply needs would be extensive and complex	
(c) Communication plan – Develop and maintain plan that complies with Fed, State, and local laws and must be reviewed and updated annually and including:	(1.) Names and contact info for i. staff ii. entities providing services under arrangement iii. resident's physicians iv. other LTC facilities v. volunteers	New requirement to have formal plan. Volunteers have not been part of expectation before this.	Communication plan guidance http://cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/CommunicationTools.aspx NHICS has tools for communication contact lists http://www.cahfdisasterprep.com/NHICS.aspx EOP Template has sample P&P and contact lists http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx Needs to be expanded to include physicians and volunteers
	(2.) Contact info for: i. fed, state, tribal, regional or local emergency prep staff ii. L&C iii. Ombudsman iv. other sources of assistance	Expanded requirement except for L&C	EOP Template http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx Needs to include Ombudsman
	(3.) Primary and alternate means for communication with: i. staff ii. fed, state tribal regional or local	Expanded requirement. Call back list of for staff only specific mentioned before in state reg.	Cell phones could be alternate, but if tower down will need to have back up Local emergency web-based portal, internet, 2 way radios will need to be explored by facility For more information about emergency communication planning: • Emergency Planning: Health Care Sector

	emergency management agencies	Primary and alternate means need to be explored.	Government Emergency Telecommunications Service (GETS) Healthcare Preparedness Capabilities - National Guidance for Healthcare System Preparedness
(c) Communication plan cont	(4.) Method for sharing info and medical documentation for residents under the LTC Facility's care, as necessary, with other health care providers to maintain continuity of care	"Disaster Tag" Could be the grab and go transfer packet. EHR planning critical due to interoperability issues	NHICS has sample resident info sheet form http://www.cahfdisasterprep.com/NHICS.aspx EOP Template has sample forms http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourcesGuides/PlanningTemplatesChecklists.aspx http://www.cahfdownload.com/cahf/dpp/RSG_ElectHealthRecord.pdf
	(5.) Means to release resident info in event of evacuation as permitted under 45 CFR 164.510(b)(1)(ii)	Under the Privacy Rule (HIPPA), covered entities may disclose, without a patient's authorization, protected health information about the patient as necessary to treat the patient or to treat a different patient. Treatment includes the coordination or management of health care and related services by one or more health care providers and	Additional information and resources regarding the application of the HIPAA Privacy Rule during emergency scenarios can be located at: • Summary of the HIPAA Privacy Rule • HIPAA Privacy in Emergency Situations • Emergency Situations: Preparedness, Planning, and Response

	others, consultation between providers, and the referral of patients Additional leniency under 1135 Waiver	
(6.) Means of providing info about general condition and location of residents 45 CFR 164.510(b)(4)	Transfer info and tracking logs	EOP Template has logs http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourc esGuides/PlanningTemplatesChecklists.aspx
(7.) Means of providing info re LTC facility's occupancy, needs, and ability to provide assistance, to authority having jurisdiction or Incident Command Center or designee	New requirement Policy and system for responding to situation status requests and bed availability polls Connecting and communicating with local centers – localized	Need to collaborate with local authorities and state survey agency on this process. Probably the process already exists with hospital reporting to the EMS agencies. SNFs may be able to participate in that system.
(8.) Method of sharing info from emergency plan that the facility has been determined appropriate with residents and their families/reps	New requirement Before event	Facility specific CMS does not specify how or frequency but leaves it up to facility to decide what is appropriate. Could be part of orientation Annual meeting Newsletter

(d) . Training and	(1.) Training	Expanded	EOP Template has training section
Testing program	program must do all	requirement.	http://www.cahfdisasterprep.com/PreparednessTopics/AllHazardResourc
 Develop and 	the following:	Volunteers and those	esGuides/PlanningTemplatesChecklists.aspx
maintain an	i. initial training in	under service	
emergency prep	emergency prep	contracts	
training and	P&P to all new and		
testing program	existing staff,		
based on the	individuals		
emergency plan	providing services		
based on risk	under arrangement,		
assessment, P&Ps and	and volunteers consistent with		
communication			
plan developed	their expected roles		
and updated at			
least annually			
i cust unit unit y	ii. provide at least		
	annually		
	iii. maintain		
	documentation of		
	training		
	iv. demonstrate		
	staff knowledge of		
	emergency		
	procedures		
	(2.) Testing – LTC		Drill templates
	must conduct		http://www.cahfdisasterprep.com/PreparednessTopics/ExerciseDrillTemp
	exercises to test		lates.aspx
	plan at least		
	annually including		https://asprtracie.hhs.gov/technical-resources/7/Exercise-Program-
	unannounced staff		Design-Evaluation-Facilitation/7
	drills using the		

	emergency procedures. LTC must do following: i. Participate in a full scale exercise that is community – based or if not accessible, conduct an individual facility- based. Exempt if experience an actual or man-made emergency that requires activation of the emergency plan for 1 year following the event	New requirement to do community exercise *Local exercises are not always built for SNF	https://www.ahcancal.org/facility_operations/disaster_planning/Docume_nts/Black%20Diamond%20-%20AAR-IP%20-%20FINAL.PDF Need to work with local authorities to include exercise elements that is relevant for SNF participation. https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertEmergPrep/Downloads/By-Name-by-State-Healthcare-Coalitions.pdf
(d)Training and Testing cont	ii. Conduct an additional exercise that may include not limited to the following: A. A second full-scale exercise that is community or individual - facility based B. A tabletop exercise that includes a group discussion led by a	New requirement Formal exercise with scenario and facilitator or second community full scale drill that specifically tests their plan	Prep a library of exercise scenarios for most common events as indicated by risk assessment http://www.cahfdisasterprep.com/PreparednessTopics/ExerciseDrillTemplates.aspx http://www.cahfdownload.com/cahf/dpp/CAHF%20Evacuation%20Drill%20Guidebook%20%20-%20041509.pdf

	facilitator using s		
	facilitator, using a		
	narrated, clinically-		
	relevant emergency		
	scenario, and a set		
	of problem		
	statements,		
	directed messages		
	or prepared		
	questions designed		
	to challenge an		
	emergency plan.		
	iii. Analyze the LTC		After Action Template
	facility's response		https://www.ahcancal.org/facility_operations/disaster_planning/Pages/P
	to and maintain		lanning-Ahead.aspx
	documentation of		
	all drills, table top		
	exercises, and		
	emergency events,		
	and revise the LTC		
	facility's emergency		
	plan as needed.		
(e) Emergency	(1.) Emergency	These are the same	Existing requirements
and standby	generator location	basic requirements	http://www.nfpa.org/news-and-research/news-and-media/press-
power systems.	in accordance found	for an emergency	room/news-releases/2016/the-us-centers-for-medicare-medicaid-
	in the Health Care	generator that is	services-now-requires-facilities-to-comply-with-nfpa-101-and-99
	Facilities Code	installed at a SNF	
	(NFPA 99 and	required to provide	http://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-
	tentative Interim	an alternate source of	of-codes-and-standards?mode=code&code=99
	Amendments (TIA	power for Life Safety	
	12-2, TIA 12-3, TIA	Compliance purposes	
	12-4, TIA 12-5 and	and when life-support	
	TIA 12-6), LSC	equipment is present.	
	(NFPA 101 and TIA	So, if it is determined	
	12-1, 12-2, 12-3, 12-	that an emergency	

4), and NFPA 110, when a new structure is built or when an existing structure or building is renovated.	generator is needed for Emergency Preparedness purposes, the installation requirements are the same as those currently enforced by NFPA 101, The Life Safety Code, 2012 edition. References: Section 15.1.3 of NFPA 99, 2012 edition Chapter 7 of NFPA 110, 2010 edition	
(2.) Must implement emergency power system inspection, testing, and maintenance requirements found in Health Care Facilities Code, NFPA 110, and LSC.	These are the same inspection, testing and maintenance requirements that facilities must follow when they have an emergency generator installed. The proposed rule was going to impose a stricter testing requirement that would have required the generator to be tested on an annual basis under full load	http://www.ltlmagazine.com/blogs/stan-szpytek/5-tips-keep-emergency-generators-performing-ltc-facilities Shelter in Place Planning Guide has section on generators https://www.ahcancal.org/facility_operations/disaster_planning/Docume nts/SIP_Guidebook_Final.pdf

		for four (4) continuous hours. This provision was not included in the final version of the rule. References: Section 15.1.3 of NFPA 99, 2012 edition Chapter 8 of NFPA 110, 2010 edition	
	(3) Emergency Generator Fuel Facilities that maintain an onsite fuel source to power emergency generators must have a plan for how it will keep emergency power systems operational during the emergency, unless evacuated.	Depending on the risk assessment, facilities might need to expand beyond the existing minimum requirements for fuel.	On-site storage may not be feasible for LTC facilities so working with vendors and local authorities for realistic re-supply plans may be an acceptable alternative to expanded amounts of fuel.
(f) Integrated healthcare	(1.) Demonstrate that each certified	New requirement	This will be corporate-specific
systems. If LTC	facility within the		Corporate entities who want to do an integrated plan will need to adhere
facility is part of	system actively		to all facility specific requirements, and the additional collaboration and
a healthcare	participated in the		communication with individually certified centers in their company.

· -		
system	development of the	
consisting of	unified and	
multiple	integrated EP	
separately	program	
certified	(2) Be developed	
healthcare	and maintained in a	
facilities that	manner that takes	
elects to have a	in to account each	
unified and	facility's unique	
integrated	circumstances,	
emergency	patient	
preparedness	populations, and	
program, they	services offered.	
may choose to	(3) Demonstrate	
participate in the	each facility is	
system's	capable of actively	
coordinated EP	using the unified	
program.	and integrated EP	
If elected the	program and is in	
unified and	compliance with	
integrated EP	the program.	
program must do	p. 08. u	
all of the		
following:		
i o ii o ii ii o	(4) Include a unified	No "one size fits" or
	and integrated	centralized
	emergency plan	equipment unless
	that meets	fully integrated and
	preceding	able to demonstrate
	requirements and is	that each facility is
	based on and	actively involved in
	include:	development and
		-
	(i) community	that their unique
	based risk	risks/pt

assessment using all	population/services	
	offered are accounted	
hazards approach		
(ii) documented	for in the plan	
individual facility-		
based risk		
assessment for each		
facility in the		
system, utilizing an		
all hazards		
approach		
(5) Includes		
integrated P&Ps		
that meet the		
requirements set		
forth, a coordinated		
communication		
plan, and training		
and testing		
programs that the		
meet requirements		

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